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11 *Attorneys for Plaintiff*

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15
16 IN RE: UBER TECHNOLOGIES, INC.,
17 PASSENGER SEXUAL ASSAULT
LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

Honorable Charles R. Breyer

18
19 **PLAINTIFFS' MEMORANDUM OF**
20 **SUPPORT IN OPPOSITION TO**
21 **DEFENDANTS' MOTION FOR ENTRY OF**
(1) ORDER TO SHOW CAUSE AND (2)
CASE MANAGEMENT ORDER

22 This Document Relates to:

Judge: Hon. Charles R. Breyer

Courtroom: 6 – 17th Floor

23 *WHB 1339 v. Uber Technologies, Inc., et*
24 *al., No. 3:24-cv-05292*

25 *WHB 645 v. Uber Technologies, Inc., et al.,*
26 *No. 3:24-cv-05356*

27 *WHB 492 v. Uber Technologies, Inc., et al.,*
28 *No. 3:24-cv-05470*

1 *WHB 1969 v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-05483*

3 *WHB 1484 v. Uber Technologies, Inc., et*
4 *al., No. 3:24-cv-05779*

5 *WHB 375 v. Uber Technologies, Inc., et al.,*
6 *No. 3:24-cv-05781*

7 *WHB 1604 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-05958*

9 *WHB 1273 v. Uber Technologies, Inc., et*
10 *al., No. 3:24-cv-05950*

11 *WHB 885 v. Uber Technologies, Inc., et al.,*
12 *No. 3:24-cv-05952*

13 *WHB 1381 v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-05603*

15 *WHB 505 v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-05709*

17 *WHB 2030 v. Uber Technologies, Inc., et*
18 *al., No. 3:25-cv-01092*

19 *WHB 2063 v. Uber Technologies, Inc., et*
20 *al., No. 3:25-cv-01099*

21 *WHB 2064 v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-01101*

23 *WHB 2066 v. Uber Technologies, Inc., et*
24 *al., No. 3:25-cv-01121*

25 *WHB 2067 v. Uber Technologies, Inc., et*
26 *al., No. 3:25-cv-01122*

27 *WHB 2069 v. Uber Technologies, Inc., et*
28 *al., No. 3:25-cv-01124*

WHB 2071 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01130

WHB 2072 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01140

WHB 2075 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01148

WHB 2076 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01149

1 *WHB 2078 v. Uber Technologies, Inc., et*
2 *al., No. 3:25-cv-01152*

3 *WHB 2081 v. Uber Technologies, Inc., et*
4 *al., No. 3:25-cv-01161*

5 *WHB 2082 v. Uber Technologies, Inc., et*
6 *al., No. 3:25-cv-01177*

7 *WHB 2084 v. Uber Technologies, Inc., et*
8 *al., No. 3:25-cv-01179*

9 *WHB 2085 v. Uber Technologies, Inc., et*
10 *al., No. 3:25-cv-01183*

11 *WHB 2036 v. Uber Technologies, Inc., et*
12 *al., No. 3:25-cv-01180*

13 *WHB 2038 v. Uber Technologies, Inc., et*
14 *al., No. 3:25-cv-01196*

15 *WHB 2042 v. Uber Technologies, Inc., et*
16 *al., No. 3:25-cv-01206*

17 *WHB 2043 v. Uber Technologies, Inc., et*
18 *al., No. 3:25-cv-01207*

19 *WHB 2037 v. Uber Technologies, Inc., et*
20 *al., No. 3:25-cv-01189*

21 *WHB 2044 v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-01209*

23 *WHB 2046 v. Uber Technologies, Inc., et*
24 *al., No. 3:25-cv-01213*

25 *WHB 2048 v. Uber Technologies, Inc., et*
26 *al., No. 3:25-cv-01216*

27 *WHB 2051 v. Uber Technologies, Inc., et*
28 *al., No. 3:25-cv-01226*

WHB 2052 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01229

WHB 2053 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01237

WHB 2054 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01244

WHB 2056 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01246

1 *WHB 2057 v. Uber Technologies, Inc., et*
2 *al., No. 3:25-cv-01247*

3 *WHB 2059 v. Uber Technologies, Inc., et*
4 *al., No. 3:25-cv-01255*

5 *WHB 491 v. Uber Technologies, Inc., et al.,*
No. 3:24-cv-05268

6 *WHB 644 v. Uber Technologies, Inc., et al.,*
7 *No. 3:24-cv-05272*

8 *WHB 1348 v. Uber Technologies, Inc., et*
9 *al., No. 3:24-cv-05669*

10 *WHB 1556 v. Uber Technologies, Inc., et*
11 *al., No. 3:24-cv-05986*

12 I. INTRODUCTION

13 To be clear, none of the 45 Williams Hart & Boundas (WHB) Plaintiffs Uber moves to
14 dismiss provided fraudulent or doctored ride receipts. Rather Uber moves to dismiss these 45
15 WHB Plaintiffs for providing “boilerplate” reasons as to why they have been unable to provide a
16 ride receipt. Uber’s draconian motion for dismissal should be denied.

17 All 45 WHB Plaintiffs have provided Uber with all information in their possession about
18 the accountholder who ordered the ride so that Uber can identify the accounts at issue. All 45
19 WHB Plaintiffs have also provided Uber with the approximate date, starting, and ending locations
20 of the ride with as much precision as possible so that Uber can identify the rides at issue. By
21 providing Uber with this information, Plaintiffs have complied with the Court’s Orders.

22 On July 30, 2025, Defendants filed a proposed Motion for Entry of (1) And Order to
23 Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be
24 Dismissed With Prejudice and (2) a Case Management Order Addressing Certain Plaintiffs Who
25 Have Not Submitted Receipts (ECF No. 3604). Defendants allege that 45 WHB Plaintiffs have
26 provided insufficient responses for why ride receipts are not available. According to Uber, 42 of
27 the WHB Plaintiffs’ articulated reasons in their uploaded Uber Ride Information Forms are
28

1 “boilerplate.” Motion at 14. Presumably, the remaining three WHB Plaintiffs’ reasons as stated in
2 their uploaded Uber Ride Information Forms are simply not detailed enough for Defendants.

3 Pretrial Orders 5 and 10 do not require the detailed explanations that Defendants seek
4 from Plaintiffs, and certainly not at the cost of dismissal with prejudice. Motion at 15. The Court
5 never demanded dismissal with prejudice of Plaintiffs who could not provide ride receipts.
6 Rather, the Court anticipated instances in which a plaintiff could not produce a ride receipt. In
7 such cases, counsel must disclose why the receipt is unavailable, the accountholder’s name,
8 phone number, and email address, the date, starting and ending locations of the ride with as much
9 precision as reasonably possible, and any other basic information that may assist Defendants in
10 identifying the ride. PTO 5 at 2 -3.

11 There is no requirement in Pretrial Orders 5 or 10 that Plaintiffs provide a detailed
12 explanation as to why they are unable to produce the receipt for the ride in question. After all, the
13 purpose of the Uber Ride Information Form is to provide data so that Uber can ultimately identify
14 the ride.

15 Two months ago, Defendants alleged that over 100 of WHB’s Uber Ride Information
16 Forms¹ were deficient in a June 17, 2025 letter. See attached **Exhibit A**. The deficiencies spanned
17 questions two through six of the Uber Ride Information Form, as opposed to question 1, the
18 subject of the current motion. WHB responded to Defendants’ letter on August 18, noting that the
19 vast majority of the Ride Information Forms (86 to be exact) were compliant with PTO 5 and 10.
20 See attached **Exhibit B**. For those cases in which the Uber Ride Information Forms were not,
21 WHB uploaded amended Forms, curing any alleged deficiencies.

22 Similarly, if the Court determines that any of the responses these 45 WHB Plaintiffs
23 provided to Question 1 in the Uber Ride Information Form are not compliant with PTO 5 or 10,
24 WHB respectfully requests that counsel be permitted to submit amended Forms.

25
26
27
28 ¹ Uber raises six of these same cases in the current motion (MDL ID 2066, 2067, 2079, 2127, 2128, 2186).

ARGUMENT

Defendants' only complaint is that these 45 plaintiffs have provided "boilerplate" reasons as to why they cannot submit a ride receipt. Indeed, in many of the 45 Uber Ride Information Forms for WHB's listed cases, the Plaintiffs note that they are unable to locate the receipt for the rides at issue. However, pursuant to PTO 5 and 10, Plaintiffs' counsel has disclosed all information in Plaintiffs' possession about the accountholder who ordered the ride (in most cases, the name, phone number, and email address); the approximate date of the ride with as much precision as is reasonably possible; the starting location and ending location of the ride with as much precision as reasonably possible; as well as any other basic information that may assist Defendants in identifying the ride in each properly produced Uber Ride Information Form.

Plaintiffs have complied with all of the Court's Pretrial Orders. Plaintiffs do not have the ride receipts for the rides at issue,² and they have stated this in their Uber Ride Information Forms. Pursuant to this Court's Pretrial Orders, because they do not have their ride receipts, they have provided the information that is required of a plaintiff who does not have her ride receipt. If Defendants believe that additional information in the Ride Information Form is somehow deficient, they should serve a deficiency notice on counsel just as they did in June.³ Defendants have not, however, in their motion, articulated any justification for how or why a more detailed explanation will help them identify the rides at issue. Defendants' desire for a more detailed explanation does not support the severe penalty of dismissal and is not supported by the Pretrial Orders.

CONCLUSION

The 45 WHB Plaintiffs Defendants seek to dismiss have complied with PTO 5 and 10 by providing a reason why the ride receipt for the ride at issue is not available. Defendants' request to include these plaintiffs in the scope of the Show Cause Order and/or to dismiss these plaintiffs

² Per PTO 10, a party must produce requested documents to the extent such documents are in the party's possession, custody, or control. While this language relates to substantial completeness of PFS and DFS, counsel adheres to it when filling out the Uber Ride Information Form as well.

³ To date, counsel has not heard back from Uber regarding the August 22 deficiency response.

1 should be denied. In the event that the Court determines some or all of Plaintiffs' Uber Ride
2 Information Forms are not compliant with PTO 5 or 10, WHB respectfully requests that counsel
3 be permitted to submit amended Forms.

4
5 Dated: August 26, 2025

/s/ Walt Cubberly

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

**ATTORNEY WALT CUBBERLY'S
 AMENDED DECLARATION [3766-1] IN
 SUPPORT OF PLAINTIFFS'
 MEMORANDUM OF LAW IN
 OPPOSITION TO DEFENDANTS'
 MOTION FOR ENTRY OF (1) ORDER TO
 SHOW CAUSE AND (2) CASE
 MANAGEMENT ORDER**

This Document Relates to:

*WHB 1339 v. Uber Technologies, Inc., et
 al., No. 3:24-cv-05292*

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*WHB 492 v. Uber Technologies, Inc., et al.,
 No. 3:24-cv-05470*

Judge: Hon. Charles R. Breyer

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1 *WHB 1969 v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-05483*

3 *WHB 1484 v. Uber Technologies, Inc., et*
4 *al., No. 3:24-cv-05779*

5 *WHB 375 v. Uber Technologies, Inc., et al.,*
6 *No. 3:24-cv-05781*

7 *WHB 1604 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-05958*

9 *WHB 1273 v. Uber Technologies, Inc., et*
10 *al., No. 3:24-cv-05950*

11 *WHB 885 v. Uber Technologies, Inc., et al.,*
12 *No. 3:24-cv-05952*

13 *WHB 1381 v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-05603*

15 *WHB 505 v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-05709*

17 *WHB 2060 v. Uber Technologies, Inc., et*
18 *al., No. 3:25-cv-01092*

19 *WHB 2063 v. Uber Technologies, Inc., et*
20 *al., No. 3:25-cv-01099*

21 *WHB 2064 v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-01101*

23 *WHB 2066 v. Uber Technologies, Inc., et*
24 *al., No. 3:25-cv-01121*

25 *WHB 2067 v. Uber Technologies, Inc., et*
26 *al., No. 3:25-cv-01122*

27 *WHB 2069 v. Uber Technologies, Inc., et*
28 *al., No. 3:25-cv-01124*

WHB 2071 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01130

WHB 2072 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01140

WHB 2075 v. Uber Technologies, Inc., et
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WHB 2076 v. Uber Technologies, Inc., et
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1 *WHB 2078 v. Uber Technologies, Inc., et*
2 *al., No. 3:25-cv-01152*

3 *WHB 2081 v. Uber Technologies, Inc., et*
4 *al., No. 3:25-cv-01161*

5 *WHB 2082 v. Uber Technologies, Inc., et*
6 *al., No. 3:25-cv-01177*

7 *WHB 2084 v. Uber Technologies, Inc., et*
8 *al., No. 3:25-cv-01179*

9 *WHB 2085 v. Uber Technologies, Inc., et*
10 *al., No. 3:25-cv-01183*

11 *WHB 2036 v. Uber Technologies, Inc., et*
12 *al., No. 3:25-cv-01180*

13 *WHB 2038 v. Uber Technologies, Inc., et*
14 *al., No. 3:25-cv-01196*

15 *WHB 2042 v. Uber Technologies, Inc., et*
16 *al., No. 3:25-cv-01206*

17 *WHB 2043 v. Uber Technologies, Inc., et*
18 *al., No. 3:25-cv-01207*

19 *WHB 2037 v. Uber Technologies, Inc., et*
20 *al., No. 3:25-cv-01189*

21 *WHB 2044 v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-01209*

23 *WHB 2046 v. Uber Technologies, Inc., et*
24 *al., No. 3:25-cv-01213*

25 *WHB 2048 v. Uber Technologies, Inc., et*
26 *al., No. 3:25-cv-01216*

27 *WHB 2051 v. Uber Technologies, Inc., et*
28 *al., No. 3:25-cv-01226*

WHB 2052 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01229

WHB 2053 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01237

WHB 2054 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01244

WHB 2056 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01246

1 *WHB 2057 v. Uber Technologies, Inc., et*
2 *al., No. 3:25-cv-01247*

3 *WHB 2059 v. Uber Technologies, Inc., et*
4 *al., No. 3:25-cv-01255*

5 *WHB 491 v. Uber Technologies, Inc., et al.,*
6 *No. 3:24-cv-05268*

7 *WHB 644 v. Uber Technologies, Inc., et al.,*
8 *No. 3:24-cv-05272*

9 *WHB 1348 v. Uber Technologies, Inc., et*
10 *al., No. 3:24-cv-05669*

11 *WHB 1556 v. Uber Technologies, Inc., et*
12 *al., No. 3:24-cv-05986*

13 I, Walt Cubberly, declare as follows:

- 14 1. I am an attorney at Williams Hart & Boundas LLP admitted to practice before the courts
15 of the State of California. I am one of the counsels of record for all filed WHB claimants.
16 I have personal knowledge of the matters set forth herein, and if called to testify, I would
17 testify competently as to the information below:
- 18 2. This amended declaration is made in support of the Opposition to Defendants' Motion for
19 Entry of (1) Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
20 Receipts Should Not Be Dismissed With Prejudice and (2) a Case Management Order
21 Addressing Certain Plaintiffs Who Have Not Submitted Receipts [3766].
- 22 3. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
23 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
24 1882, WHB 491 on August 21, 2024. See **Exhibit A** to Defendants' Motion for Entry of
25 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
26 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
27 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
28 Vartain at paragraph 37, attaching **Exhibit 25**, a spreadsheet containing the names of 90

plaintiffs who did not produce a bona fide ride receipt in the litigation. The spreadsheet also contains the following information from all 45 WHB Plaintiffs' submitted Uber Ride Information Forms: Plaintiff Id Number; Name (redacted); Firm Name; Date of Uber Ride Information Form; Why the Ride Receipt is Unavailable, Accountholder Name, email address, and phone number (all redacted), Approximate Date of Ride; Approximate Starting Address of Ride (redacted); Approximate Ending Address of Ride (redacted); Any Other Information That May Assist Defendants in Identifying Ride; If Items 2 Through 6 Cannot Be Provided, Explanation as to Why Information is Not Readily Ascertainable.

4. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID1883, WHB 644 on August 21, 2024. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

5. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID1889, WHB1339 on August 21, 2024. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

- 1 6. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
2 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
3 1928, WHB 645 on August 23, 2024. See **Exhibit A** to Defendants' Motion for Entry of
4 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
5 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
6 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
7 Vartain at paragraph 37, attaching **Exhibit 25**.
- 9 7. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
10 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
11 1949, WHB 492 on August 23, 2024. See **Exhibit A** to Defendants' Motion for Entry of
12 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
13 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
14 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
15 Vartain at paragraph 37, attaching **Exhibit 25**.
- 17 8. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 1984, WHB 1969 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.
- 25 9. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
26 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
27 2066, WHB 1484 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
28

1 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
2 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
3 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
4 Vartain at paragraph 37, attaching **Exhibit 25**.

5
6 10. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
7 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
8 2067, WHB 375 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
9 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
10 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
11 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
12 Vartain at paragraph 37, attaching **Exhibit 25**.

13
14 11. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
15 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
16 2079, WHB 1604 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
17 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
18 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
19 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
20 Vartain at paragraph 37, attaching **Exhibit 25**.

21
22 12. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
23 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
24 2127, WHB 1273 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
25 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
26 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
27
28

1 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
2 Vartain at paragraph 37, attaching **Exhibit 25**.

3 13. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
4 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
5 2128, WHB 885 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
6 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
7 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
8 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
9 Vartain at paragraph 37, attaching **Exhibit 25**.

10 14. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
11 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
12 2133, WHB 1381 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
13 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
14 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
15 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
16 Vartain at paragraph 37, attaching **Exhibit 25**.

17 15. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 2174, WHB 1381 on August 27, 2024. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.

1 16. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
2 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
3 2180, WHB 1556 on August 27, 2024. See **Exhibit A** to Defendants' Motion for Entry of
4 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
5 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
6 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
7 Vartain at paragraph 37, attaching **Exhibit 25**.
8

9 17. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
10 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
11 2186, WHB 505 on August 27, 2024. See **Exhibit A** to Defendants' Motion for Entry of
12 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
13 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
14 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
15 Vartain at paragraph 37, attaching **Exhibit 25**.
16

17 18. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 2850, WB 2060 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.
24

25 19. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
26 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
27 2854, WHB 2063 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
28

1 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
2 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
3 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
4 Vartain at paragraph 37, attaching **Exhibit 25**.

5
6 20. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
7 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
8 2855, WHB 2064 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
9 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
10 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
11 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
12 Vartain at paragraph 37, attaching **Exhibit 25**.

13
14 21. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
15 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
16 2857, WHB 2066 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
17 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
18 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
19 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
20 Vartain at paragraph 37, attaching **Exhibit 25**.

21
22 22. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
23 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
24 2859, WHB 2067 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
25 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
26 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
27
28

1 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
2 Vartain at paragraph 37, attaching **Exhibit 25**.

3 23. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
4 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
5 2860, WHB 2069 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
6 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
7 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
8 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
9 Vartain at paragraph 37, attaching **Exhibit 25**.

11 24. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
12 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
13 2862, WHB 2071 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
14 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
15 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
16 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
17 Vartain at paragraph 37, attaching **Exhibit 25**.

19 25. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
20 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
21 2863, WHB 2072 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
22 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
23 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
24 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
25 Vartain at paragraph 37, attaching **Exhibit 25**.

1 26. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
2 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
3 2866, WHB 2072 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
4 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
5 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
6 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
7 Vartain at paragraph 37, attaching **Exhibit 25**.
8

9 27. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
10 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
11 2867, WHB 2076 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
12 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
13 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
14 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
15 Vartain at paragraph 37, attaching **Exhibit 25**.
16

17 28. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 2869, WHB 2078 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.
24

25 29. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
26 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
27 2872, WHB 2081 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
28

1 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
2 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
3 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
4 Vartain at paragraph 37, attaching **Exhibit 25**.

5
6 30. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
7 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
8 2874, WHB 2082 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
9 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
10 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
11 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
12 Vartain at paragraph 37, attaching **Exhibit 25**.

13
14 31. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
15 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
16 2876, WHB 2084 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
17 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
18 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
19 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
20 Vartain at paragraph 37, attaching **Exhibit 25**.

21
22 32. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
23 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
24 2877, WHB 2085 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
25 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
26 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
27
28

1 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
2 Vartain at paragraph 37, attaching **Exhibit 25**.

3 33. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
4 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
5 2878, WHB 2036 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
6 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
7 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
8 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
9 Vartain at paragraph 37, attaching **Exhibit 25**.

11 34. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
12 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
13 2880, WHB 2038 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
14 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
15 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
16 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
17 Vartain at paragraph 37, attaching **Exhibit 25**.

19 35. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
20 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
21 2884, WHB 2042 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
22 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
23 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
24 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
25 Vartain at paragraph 37, attaching **Exhibit 25**.

1 36. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
2 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
3 2885, WHB 2043 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
4 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
5 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
6 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
7 Vartain at paragraph 37, attaching **Exhibit 25**.
8

9 37. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
10 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
11 2887, WHB 2037 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
12 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
13 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
14 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
15 Vartain at paragraph 37, attaching **Exhibit 25**.
16

17 38. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 2888, WHB 2044 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.
24

25 39. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
26 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
27 2890, WHB 2046 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
28

1 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
2 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
3 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
4 Vartain at paragraph 37, attaching **Exhibit 25**.

5
6 40. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
7 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
8 2892, WHB 2048 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
9 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
10 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
11 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
12 Vartain at paragraph 37, attaching **Exhibit 25**.

13
14 41. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
15 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
16 2896, WHB 2051 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of
17 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
18 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
19 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
20 Vartain at paragraph 37, attaching **Exhibit 25**.

21
22 42. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
23 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
24 2898, WHB 2052 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of
25 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
26 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
27
28

Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

43. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2899, WHB 2053 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

44. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2900, WHB 2054 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

45. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2878, WHB 2036 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

1 46. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
2 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
3 2903, WHB 2056 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of
4 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
5 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
6 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
7 Vartain at paragraph 37, attaching **Exhibit 25**.
8

9 47. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
10 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
11 2904, WHB 2057 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
12 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
13 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
14 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
15 Vartain at paragraph 37, attaching **Exhibit 25**.
16

17 48. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 2906, WHB 2059 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.
24

25 49. I declare under penalty of perjury that the foregoing is true and correct, and that this
26 declaration was executed on August 28, 2025 in Houston, Texas.
27
28

1 Dated: August 28, 2025

/s/ Walt Cubberly
Walt Cubberly

Attorneys for Plaintiff

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